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FIRM and AFFILIATE OFFICES

SETH A. GOLDBERG
DIRECT DIAL: +1 215 979 1175
PERSONAL FAX: +1 215 689 2198
E-MAIL: SAGoldberg@duanemorris.com

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January 3, 2022

VIA ECF AND EMAIL

The Honorable Robert B. Kugler
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case
No. 1:19-md-02875-RBK**

Dear Judge Kugler:

We write on behalf of ZHP in connection with the Court's Opinion and Order (the "Opinion and Order") denying ZHP's motion to vacate Special Master Order No. 35 (ECF No. 1825) to respectfully request one modest extension, to which Plaintiffs have consented, and another modest extension, to which Plaintiffs take no position.

Due to the Christmas and New Year's holidays, which have impeded the necessary communications between ZHP and its U.S. and Chinese Counsel about the Opinion and Order, ZHP requires additional time to evaluate the implications of the Court's ruling under both Chinese and U.S. law. In this connection, ZHP is attempting to communicate with the Chinese government about the Opinion and Order and the production of the documents at issue this week. Accordingly, ZHP respectfully requests the Court grant a short extension of the deadline for moving for reconsideration of the Opinion and Order from January 4 to January 7, 2022, as ZHP anticipates that the need for such motion, if any, would likely be informed by this meeting with the Chinese authorities. Plaintiffs have consented to this request.

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In addition, given the technical requirements for producing documents under the operative ESI Protocol, and in light of the possible motion for reconsideration as to certain aspects of the Opinion and Order, ZHP respectfully requests the production deadline of January 5 set forth in SMO No. 35 be held in abeyance until January 14, if a motion reconsideration is not filed, or until such time as a motion for reconsideration, if filed, is resolved. Plaintiffs take no position as to this request.

We thank the Court for its courtesies and consideration of this request.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Jessica Priselac (*via email*)
Adam Slater (*via email*)
Christopher Geddis (*via email*)
Plaintiffs' Executive Committee (*via email*)